



U.S. Department of Justice

*United States Attorney
Southern District of New York*

86 Chambers Street
New York, New York 10007

August 9, 2022

BY ECF

Hon. Edgardo Ramos
United States District Judge
United States Courthouse
40 Foley Square
New York, New York 10007

Re: *ACLU et al. v. Customs and Border Protection et al.*, 21 Civ. 10430 (ER)

Dear Judge Ramos:

This Office represents the defendant agencies in the above-referenced action brought under the Freedom of Information Act (“FOIA”). Pursuant to the Court’s order, I write respectfully to provide the Court with an updated status report regarding the agencies’ outstanding searches and productions in this case, some of which have been delayed from the agencies’ original estimates.

Customs and Border Protection: made its initial production on July 21, 2022. CBP has also located additional responsive documents and is processing those, while continuing to search for additional responsive documents.

Immigration and Customs Enforcement: made its initial production on June 9, and made an additional production on July 11. ICE intends to complete its remaining productions by mid-August, including referred documents.

U.S. Secret Service: has completed its searches and expects to make its final production by the end of August.

Federal Bureau of Investigation: produced one policy document on June 21 and has since completed its searches; still scoping documents to identify the universe of potentially responsive documents.

Drug Enforcement Administration: previously estimated that it would make its release by the end of June, and now anticipates that it will be done by the end of August.

U.S. Marshals Service: made its initial production in mid-July and projects that it will complete its productions by the end of August.

The parties will make their next monthly status report on September 8, 2022. We thank the Court for its consideration of this matter.

Respectfully,

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United States Attorney

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cc: Counsel for plaintiffs (by ECF)